



February 26, 2010
VIA ECFS

Ms. Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36
2009 CPNI Certification Filing for Aventure Communication Technologies LLC

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2010-01, DA 10-91, EB Docket No. 06-36, released January 15, 2010 and pursuant to 47 C.F.R. § 64.2009(e), Aventure Communication Technologies LLC files its Certification and attached Statement of Customer Proprietary Network information (CPNI) for the year 2009. Please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or stthomas@tminc.com if you have any questions about this filing.

Sincerely,

/s/Sharon Thomas
Sharon Thomas
Consultant to Aventure Communication Technologies LLC

ST/im.

Enclosure

cc: Best Copy and Printing FCC@BCPIWEB.COM
M. Gossage, Aventure, LLC
File: Aventure, LLC. - FCC CPNI
TMS: FCC1001

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010:	Covering calendar year 2009
Name of company(s) covered by this certification:	Aventure Communication Technologies LLC
Form 499 Filer ID:	825749
Name of signatory:	Tim Jenkins
Title of signatory:	Chief Operating Officer

1. I, Tim Jenkins, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



Tim Jenkins, Chief Operating Officer

2/26/10

Date

Attachments: Accompanying Statement explaining CPNI procedures

CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

Annual CPNI Compliance Certificate-Summary of Operating Procedures

Our Company has established operating procedures that are adequate to ensure its compliance with the rule in Title 47 – Telecommunications, sections 64.2001 *et seq.*

1. The Company has established a system by which the status of a customer's approval for use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
2. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use or release CPNI. However, Company Personnel make no decisions regarding CPNI without first consulting with myself or Monica Gossage, the Company's Office Manager. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
3. The Company has a policy for addressing customer requests for access to their own CPNI.
4. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. The Company maintains these records in its offices for a minimum of one year.
5. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of the supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of CPNI, must first consult with myself or the Office Manager regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, either the Office Manager or the Chief Operating Officer consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from either the Office Manager or the Chief Operating Officer regarding any proposed use of CPNI.

6. Further, both the Office Manager and the Chief Operating Officer personally oversee the use of opt-in or other approval requirements contained in the FCC's regulations. The COO also reviews all notices required by the FCC regulations for compliance therewith.
7. The Office Manager and the COO also ensure that the Company enters into confidentiality agreements, as necessary, if it discloses or provides access to CPNI for any purpose.
8. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
9. The company has procedures in place for notifying applicable law enforcement personnel and customers, as permitted, after discovery of a breach of a customer's CPNI. The Company will maintain a record of all breaches discovered, notifications made to law enforcement and customers, and to the extent possible, dates of discovery and notification of the breach, a description of the CPNI that was subject to the breach, and the circumstances of the breach, for a minimum of two years.